

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

<b>IN RE: ATRIUM MEDICAL CORP. C-QUR MESH PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 1:16-md-02753-LM MDL No. 2753</b>
<b>THIS DOCUMENT RELATES TO: ALL CASES</b>	<b>LANDYA B. MCCAFFERTY U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' MOTION TO ENFORCE THE COURT'S MARCH 9, 2018  
ORDER REQUIRING DEFENDANTS TO PRODUCE OF A PRIVILEGE LOG AND  
FOR SANCTIONS UNDER RULE 37(b)(2)(A) FOR DEFENDANTS' WILLFUL  
VIOLATION OF THE COURT'S ORDER**

Now come Plaintiffs, by and through the Plaintiffs' Executive Committee, and hereby move this Court for an Order enforcing the March 9, 2018 Order compelling Defendants to produce an item-by-item, metadata privilege log and/or sanctioning the Defendants, pursuant to F.R.C.P. 37(b)(2)(A) and LR 1.3(a), for their violation of the Order and LR 37.1. Specifically, Plaintiffs are requesting that the Court deem Defendants' privilege objections waived and order Defendants to produce the 160,000 documents they are withholding within two weeks. Plaintiffs are also seeking an award of attorneys' fees and expenses, and any other relief the Court deems just.

Dated: March 29, 2018

Respectfully submitted,

/s/ Jonathan D. Orent

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this action.

Respectfully submitted,

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